REMARKS

In the Final Office Action, the Examiner rejected claims 1-25 under 35 U.S.C. 102(b) as being anticipated by Pedersen et al. (U.S. Patent No. 6,134,705). In this Amendment, no claims have been canceled or added. Accordingly, claims 1-25 will be pending after entry of this Amendment.

I. Rejections under 35 U.S.C. 102(b)

In the Final Office Action, the Examiner rejected claims 1-25 under 35 U.S.C. 102(b) as being anticipated by Pedersen et al. (U.S. Patent No. 6,134,705, hereinafter Pedersen). Independent claims 1, 2, and 12 have been amended and as the rejections may be applied to amended claims, the Applicants respectfully traverse.

Amended claim 1 recites a data storage structure that stores a plurality of sub-networks, wherein each sub-network performs a set of output functions and comprises a set of circuit elements, at least some of the sub-networks comprising a first circuit having a first output outside the sub-network and a second circuit having a second output outside the sub-network, wherein the first circuit receives a direct or indirect input from the second circuit, wherein each sub-network is stored based on a set of indices derived from the set of output functions performed by the sub-network, the set of indices being used to retrieve the sub-network from the data storage structure.

Rather, Pedersen discloses a method for performing an incremental recompile of an electronic design by identifying a "sub-netlist" within the larger netlist of a changed design (*see* abstract). Column 11, lines 44-60 of Pedersen states that this method includes comparing original and changed synthesized netlists against one another to confirm which nodes of the synthesized

netlist have changed. The Examiner states that this portion of Pedersen indicates that new and original sub-netlists are saved. Applicants note, however, that this portion of Pedersen does not actually disclose that the sub-netlists are stored but that the storing of the sub-netlists is only being implied from the disclosure in Pedersen.

Even assuming for arguments sake that Pedersen discloses the storing of the sub-netlists, no where in Pedersen is it disclosed or suggested that netlists or sub-netlists are stored based on a set of indices derived from the set of output functions performed by a sub-network, as required in claim 1. In fact, Pedersen does not directly discuss any manner for storing sub-netlists in a storage structure. The only portion of Pedersen that even implies a manner of storing netlists in a storage structure states that "netlist differencing involves matching components (e.g., gates) of two netlists having the same user-assigned names," (col. 11, lines 23-25). This portion of Pedersen implies that netlists are stored based on user-assigned names and not a set of indices derived from the set of output functions performed by a sub-network, as required in claim 1.

In general, there are any number of ways to store netlists or sub-netlists in a data structure storage, and it can not be simply assumed that Pedersen stores netlists or sub-netlists in the manner recited in claim 1. As such, Applicants respectfully request that the Examiner cite the specific portion(s) of Pedersen that disclose storing a sub-network based on a set of indices derived from the set of output functions performed by the sub-network. Further, Pedersen does not disclose or suggest that such a set of indices is used to retrieve the sub-network from the data storage structure, as further required in claim 1. This is due to the fact that Pedersen also does not discuss any manner for retrieving netlists or sub-netlists from a data structure.

Similarly, Pedersen does not disclose or suggest storing a sub-network based on a parameter derived from the set of output functions of the sub-network, the parameter being used to retrieve the sub-network from the data storage structure, as required in independent claims 2 and 12. Pedersen does not disclose or suggest these limitations for reasons similar to those given above for claim 1.

For the above reasons, Applicants submit that Pedersen does not teach or suggest the limitations of independent claims 1, 2, or 12 and that these claims are in allowable form. Claims 3-11 are dependent on claim 2 and are allowable for at least the same reasons as claim 2. Claims 13-25 are dependent on claim 12 and are allowable for at least the same reasons as claim 12.

II. Information Disclosure Statement

Accompanying this Amendment is a copy of a recently submitted Electronic Information Disclosure Statement. This Electronic Information Disclosure Statement lists additional references for the Examiner's consideration. The Examiner is requested to make this document of record.

CONCLUSION

Based on the foregoing remarks, Applicants believe that the rejections in the Final Office Action of 6/2/2005 are fully overcome and that the application is in condition for allowance. If the Examiner has any questions regarding the case, the Examiner is invited to contact Applicants' undersigned representative at the number given below.

Respectfully submitted,

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Dated: 7/18/05

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